

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

**Traci Alexis Miller & Maurice
Western,**

Debtors.

Chapter 7

Bankruptcy No. 15-28416

Honorable Jacqueline P. Cox

COVER SHEET FOR FIRST AND FINAL FEE
APPLICATION OF FACTORLAW FOR COMPENSATION

Name of Applicant: Law Offices of William J. Factor, Ltd.

Authorized to Provide
Professional Services to: Karen R. Goodman, Chapter 7 Trustee for the
estate of Traci Alexis Miller & Maurice
Western

Period for Which
Compensation is Sought: October 14, 2015 through May 23, 2016.

Amount of Fees Sought: \$ 14,783.13

Amount of Expense
Reimbursement Sought: \$ 98.44

This is a: First and Final Application

The aggregate amount of fees and expenses *paid* to the Applicant to
date for services rendered and expenses incurred herein is: \$ 0.00.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

**Traci Alexis Miller & Maurice
Western,**

Debtors.

Chapter 7

Bankruptcy No. 15-28416

Honorable Jacqueline P. Cox

NOTICE OF APPLICATION

Please take notice that on **June 16, 2016, at 9:30 A.M.** or as soon thereafter as counsel may be heard, the undersigned attorneys shall appear before the Honorable Jacqueline P Cox, United States Bankruptcy Judge for the Northern District of Illinois, in Courtroom 680 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois, or any other judge sitting in her place and stead, and shall then and there present the attached **FactorLaw's First and Final Application for Compensation and Reimbursement of Expenses**, a copy of which is attached hereto and herewith served upon you. You may appear if you so choose.

Dated: May 24, 2016

**THE LAW OFFICES OF
WILLIAM J. FACTOR, LTD.**

By: /s/ Z. James Liu
One of its Attorneys

William J. Factor (6205675)
Sara E. Lorber (6229740)
Z. James Liu (6313367)
FACTORLAW
105 W. Madison, Suite 1500
Chicago, IL 60602
Tel: (312) 373-7227
Fax: (847) 574-8233

CERTIFICATE OF SERVICE

I, Z. James Liu, an attorney, hereby certify that on May 24, 2016, pursuant to Section II.B.4 of the Administrative Procedures for the Case Management/Electronic Case Filing System and Fed.R.Civ.P. 5(a), I caused a copy of the foregoing *Notice of Application* and the accompanying *Application* to be served electronically through the Court's Electronic Notice for Registrants on all persons identified as Registrants on the below Service List and by U.S. Mail on all other persons identified on the Service List.

/s/ Z. James Liu

SERVICE LIST

Registrants

(Service via ECF)

William J. Factor	wfactor@wfactorlaw.com, wfactorlaw@gmail.com, bharlow@wfactorlaw.com, wfactor@ecf.inforuptcy.com, wfactormyecfmail@gmail.com
Patrick S. Layng	USTPRegion11.ES.ECF@usdoj.gov
Karen R. Goodman	kgoodman@taftlaw.com, il24@ecfcbis.com, sfdocket@shesksylaw.com, nbeagan@taftlaw.com
Zhijun James Liu	jliu@wfactorlaw.com, bharlow@wfactorlaw.com, jliu@ecf.inforuptcy.com, nbouchard@wfactorlaw.com
Anne I. Shaw	ashaw@shawattorneys.com, rtanguay@shawattorneys.com, cshaw@shawattonreys.com, jdegrado@shawattorneys.com, sbutler@shawattorneys.com

Non-Registrants

(Service via U.S. Mail)

Maurice Western & Traci Alexis Miller

712 Harrison St.
Gary, IN 46402

See attached mailing matrix.

Label Matrix for local noticing
0752-1
Case 15-28416
Northern District of Illinois
Chicago
Thu Mar 31 09:01:08 CDT 2016

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

1st FRANKLIN FINANCIAL
444 STRIPLING CHAPEL ROAD
SUITE 300
CARROLLTON, GA 30117-7796

1st Franklin Financial
444 Stripling Chapel Road
Suite 300
Carrollton, GA 30117-7796

2702 West Warren #4
Chicago, IL 60612-2037

AARONS LEASING AND RENTS
309 EAST PACES FERRY RD NE
ATLANTA, GA 30305-2377

AARONS RENT AND LEASING
309 EAST PACES FERRY RD NE
ATLANTA, GA 30305-2377

AMCOL Columbia
POB 21625
Columbia, SC 29221-1625

(p)ANN ARBOR CREDIT BUREAU INC
PO BOX 7820
ANN ARBOR MI 48107-7820

ARS INC
P.O. BOX 321472
FLOWOOD, MS 39232-1472

ATT
ACCOUNT RECEIVABLE
208 S AKARD ST
DALLAS TX 75202-4295

ATT Bankruptcy Center
POB 769
Arlington, TX 76004-0769

ATT PHONE SERVICE
BANKRUPTCY CENTER
PO BOX 769
ARLINGTON, TX 76004-0769

AUTO OWNERS INSURANCE COMPANY
James P Cavanaugh (Retained)
Gaston, Cavanaugh & Giesel
7168 Graham Rd
Ste 160
INDIANAPOLIS, IN 46250-2677

AUTO OWNERS INSURANCE COMPANY
LATITUDE SUBROGATION SERVICES
1760 S TELEGRAPH ROAD STE 104
BLOOMFIELD HILLS, MI 48302-0181

Arrons Leasing and Rents
309 E Paces Ferry Rd NE
Atlanta, GA 30305-2377

Attn: N.A. Winfrey
401 Boradway Suite 101a
Gary, IN 46402-1236

CARROLL EMC (CARROLLTON, GEORGIA)
155 NORTH HIGHWAY 113
CARROLLTON, GA 30117-7501

CARROLL FINANCE
1004 BANKHEAD HIGHWAY B-27
CARROLLTON, GA 30117-1849

CARROLLTON GEORGIA WATER UTILITY
315 BRADLEY STREET
CARROLLTON, GA 30117-3219

CHASE BANK
3800 BROADWAY
GARY, IN 46408

CHASE BANK
PO BOX 183164
COLUMBUS, OH 43218-3164

COLUMBIA HOUSE

COLUMBIA HOUSE
1400 NORTH FRUITRIDGE AVENUE
TERRE HAUTE, IN 47804-1776

COMCAST
650 CENTERTON ROAD
MOORESTOWN, NJ 08057-3985

COMCAST CABLE, INC
650 CENTERTON RD
MOORESTOWN, NJ 08057-3915

COMED
PO BOX 805379
CHICAGO, IL 60680-4179

COMED (COMMONWEALTH EDISON)
PO BOX 805379
CHICAGO, IL 60680-4179

COMPLETE CREDIT SOULTION
2921 BROWN TRAIL #100
BEDFORD, TX 76021-4174

CREDIT CEENTRAL
704 BANKHEAD HIGHWAY
CARROLLTON, GA 30117-1962

Carroll EMC
155 North Highway 113
Carrollton, GA 30117-7501

Carroll Finance
1004 Bankhead Highway
Carrollton, GA 30117-1849

Carrollton GA Utility Billing/Water
Department
315 Bradley Street
Carrollton, GA 30117-3219

Chase Bankruptcy Dept
POB 15298
Wilmington, DE 19850-5298

City of Hobart Indiana
414 Main Street
Hobart, IN 46342-4444

Columbia House
1400 Nort Fruitridge Ave
Terre Haute, In 47804-1776

Com_Ed DBA Commonwealth Edison
3 Lincoln Center
Attn: Bkcy Group Claims Department
Oakbrook Terrace, IL 60181-4204

Commonwealth Edison Co
3 Lincoln Center
Attn: Bankruptcy Section
Oak Brook Terrace IL 60181-4204

Complete Credit Solutions
2921 Brown Trail #100
Bedford, TX 76021-4174

Credit Central
704 Bankhead Highway
Carrollton, GA 30117-1962

DISNEY MOVIE CLUB
PO BOX 738
NEENAH, WI 54957-0738

DRIVETIME
P.O BOX 29018,
PHOENIX, AZ 85038-9018

DRIVETIME CREDIT
PO BOX 53087
PHOENIX, AZ 85072-3087

Disney Movie Club
POB 758
Neenah, WI 54957-0758

FIRST PREMIER BANK CRD
TCF BANK
PO BOX 5524
SIOUX FALLS, SD 57117-5524

FIRST PREMIER CREDIT CARD
PO BOX 5524
SIOUX FALLS, SD 57117-5524

GARY CITY COURT-
401 BORADWAY, GARY, IN 46402

GARY INDIANA SANITATION DEPARTMENT
ATTN URSULA
839 BROADWAY
GARY, IN 46402-2414

GARY INDIANA SERVICES
200 EAST 5TH AVENUE
GARY, IN 46402-1309

Gary City Court
555 Polk Street
Gary, IN 46402-1742

Gary City Court
555 Polk Street
Gary, IN 46402-1742
Attn: Kim

HIGHLIGHTS MAGAZINE
803 CHURCH STREET
HONESDALE, PA 18431-1877

HOLYCROSS HOSPITAL
2701 WEST 68TH ST
CHICAGO, IL 60629-1882

ILLINOIS TOLLWAY AUTHORITY
2700 OGDEN AVENUE
DOWNERS GROVE, IL 60515-1703

INDIANA AMERICAN WATER
1025 LAUREL OAK ROAD
VOORHEES, NJ 08043-3506

INDIANA AMERICAN WATER
555 EAST COUNTYLINE ROAD
GREENWOOD, IN 46143-1064

INSTALOAN
1670 NORTH US HIGHWAY 27
CARROLLTON, GA 30117

Indiana AMERICAN Water
1025 Oak Laurel Road
Voorhees, NJ 08043-3506

Instaloan
1670N US Highway 27
Carrollton, GA 30117

J.D. BYRIDER
12802 HAMILTON CROSSING BLVD
CARMEL, IN 46032-5424

J.D. Byrider
12802 Hamilton Crossing Blvd
Carmel, IN 46032-5424

JESSEME BYSONG MCVEY
PO BOX 1297
PORTAGE, IN 46368

JESSEME SONG MCVEY
2702 WEST WARREN #4
CHICAGO, IL 60612-2037

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Jesseme Bysong Mcvey
POB 1297
Portgage, In 46368

KATHLEEN STENSON
2471 SAINT ANDEWS DRIVER
OLYMPIA FIELD, IL 60461-1166

Kathleen Stenson
2471 Saint Andrew Driver
Olympia Fields, IL 60461-1166

LAKE COUNTY INDIANA SUPERIOR COURT
2293 MAIN
STREET, CROWN POINT, IN 46307-1854

LAKE STATION INDIANA MUNICIPAL COURT
1969 CENTRAL AVE
LAKE STATION, IN 46405-2059

Lake Station City Court
1969 Central Ave
Lake Station, IN 46405-2399

Lake Superior Court #7
2293 Main Street
Crown Point, IN 46307-1854
Attn: Linda

MARION COUNTY INDIANA
200 E WASHINGTON ST SUITE W122
INDIANAPOLIS, IN 46204-3335

MIDLAND FUNDING LLC
227 W TRADE ST. STE 1610
CHARLOTTE, NC 28202-1676 877-434-3713

MIDLAND FUNDING LLC
2365 NORTHSIDE 3RD FLOOR
SAN DIEGO, CA 92108-2709

Midland Credit Management
8875 Aero Drive Suite 200
San Diego, CA 92123-2255

Midland Funding LLC
227 West Trade Streette 1610
Charlotte, NC 28202-1676

NIPSCO
801 E 86TH AVE
MERRILLVILLE, TN 46410-6272

Nipsco
801 East 86th Ave
Merrillville, IN 46410-6272

OFFICE OF PRIVACY -LEGAL DEPARTMENT
PO BOX 4600
RESTON, VA 20195-1416

ONLINE COLLECTIONS
P.O. BOX 1489
WINTERVILLE, NC 28590-1489

Office of Privacy
POB 4600
Reston,VA 20195-1416

PATRICIA A LLOYD, M.D.
340 BLVD NE
ATLANTA GA 30312-1285

PEOPLES ENERGY
ATTN CUSTOMER SERVICE
200 E RANDOLPH
CHICAGO, IL 60601-6302

PEOPLES GAS
200 E RANDOLPH
CHICAGO, IL 60601-6302

PROPERTY LIQUIDATOR/TIM LOVELESS
1628 CAMELLIA DRIVE
MUNSTER, IN 46321-3947

PROPERTY LIQUIDATOR/TIM LOVELESS
3715 WASHINGTON
GARY, IN 46408-2204

Porania LLC
P. O. Box 11405
Memphis TN 38111-0405

Porania LLC
c/o Biltmore Asset Management
24500 Center Ridge Rd Ste 472
Westlake, OH 44145-5605

Premier Bankcard, Llc
c o Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-7999
Orig By: Premier Bankcard Mc

Property Liquidators
3715 Washington
Gary, In 46408-2204

Property Liquidators, Inc.
c/o Genetos Retson & Yoon LLP
1000 E. 80th Place
Suite 555 North Tower
Merrillville, IN 46410-5673

Property Liquidators/Tim
Loveless
1628 Camellia Drive
Muster, In 46321-3947

QVC Inc
1200 Wilson Drive at Studio
Park
West Chester, PA 19380-4267

REGIONS BANK
1900 FIFTH AVENUE
BIRMINGHAM, AL 35203-2670

RENT A CENTER
5501 HEADQUARTERS DRIVE
PLANO, TX 75024-5845

Regions Bank
1300 5th Ave
Birmingham, AL 35228

SPRINT PCS
6480 SPRINT PARKWAY
OVERLAND PARK, KS 66251-6106

STATE OF INDIANA DRIVER SERVICES
ATTN LEGAL DEPT
BMV IGCN ROOM N404
100 NORTH SENATE AVE
INDIANAPOLIS, IN 46204-2273

STERLING FINANCE
1345 SOUTH PARK ST
CARROLLTON, GA 30117-4433

SUNSET FINANCE
6678 BROAD STREET
DOUGLASVILLE, GA 30134-1787

SUNSET FINANCE
726 BANKHEAD HIGHWAY
CARROLLTON, GA 30117-1918

SUNTRUST BANK
919 EAST MAIN ST
RICHMOND VA 23219-4625

SWISS COL/GRANDEPOINT
112 7TH AVE,
MONROE, WI 53566

Secretary of State
Bankruptcy Dept
2701 S Dirksen Prkwy
Springfield, IL 62723-1000

(p)SPRINT NEXTEL CORRESPONDENCE
ATTN BANKRUPTCY DEPT
PO BOX 7949
OVERLAND PARK KS 66207-0949

State of Indiana Driver Service (BMV)
Attn: Legal Dept
BMV IGCN Room N404
100 North Senate Ave
Indianapolis, In 46204-2273

Sterling Finance
1345 South Park Ave
Carrollton GA, 30117-4433

Suntrust bank
519 E Main Street
Richmond, VA 23219-2407

Swisscol/Grandepoint
112 7th Ave
Monroe, WI 53566

(p)C O AMERICAN INFOSOURCE LP
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

TANNER HOSPITAL
705 DIXIE ST
CARROLLTON, GA 30117-3818

TCF NATIONAL BANK
LEGAL PROCESSING DEPARTMENT
OPS-SD-G
4101 WEST 38TH ST
SIOUX FALLS, SD 57106-0741

TCF National Bank Legal Processing
Department
OPS-SD-G
4101 W 38th Street
Sioux Falls, SD 57106-0741

THE CITY OF GARY INDIANA
ATTN N.A. WINFREY
401 BROADWAY SUITE 101A
GARY, IN 46402-1236

THE CITY OF GARY INDIANA SANITATION DEPT
ATTN URSULA
839 BROADWAY
GARY, IN 46402-2417

TRUST RECOVERY SERVICES
541 OTIS BOWEN DRIVE,
MUNSTER, IN 46321-4158

Tanner Hosiptal
705 Dixie Street
Carrollton, GA 30117-3818

ULTRA FOODS (MERRILLVILLE)
ATTN CAMERON SCADDEN
2244 45TH ST
HIGHLAND, IN 46322-2629

(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

US Bank
POB 5529
Cincinnati, OH 45201

Utlra Foods Merrillville
Attn: Cameron Cadden
2244 45th Street
Highland, In 46322-2629

Vivint
4931 N 300 W
Provo, UT 84604-5816

WESTERN SHAMROCK CORP
801 S ABE (2A)
San Angelo, TX 76903-6735

WESTERN SHAMROCK CORPORATION
801 S ABE
SAN ANGELO, TX 76903-6735

WILKES FINANCE CORPORATION
6160 FAIRBURN ROAD
DOUGLASVILLE, GA 30134-1993

Wilkes Finance Corporation
61690 Fairburn Road
Douglasville, GA 30134-1993

Karen R Goodman ESQ
Taft Stettinius & Hollister LLP
111 East Wacker Dr
Suite 2800
Chicago, IL 60601-4277

Maurice Western
P.O. Box 2067
Carrollton, GA 30112-0039

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Ronald Stepney
540 W. Briar Place Suite B
Chicago, IL 60657-4661

Traci Alexis Miller
P.O. Box 2067
Carrollton, GA 30112-0039

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

ANN ARBOR CREDIT BUREAU
311 N MAIN ST.
ANN ARBOR, MI 48104

Jefferson Capital Systems LLC
Purchased From Fingerhut
Po Box 7999
Saint Cloud Mn 56302-9617
Orig By: Fingerhut Freshstart

Sprint Corp.
Attn Bankruptcy Dept
PO Box 7949
Overland Park KS 66207-0949

T MOBILE
BANKRUPTCY TEAM
PO BOX 53410
BELLEVUE, WA 98015-3410

(d)T Mobile Bankruptcy Team
POB 53410
Bellevue, WA 980158-3410

US BANK
800 NICOLLET MALL
MINNEAPOLIS, MN 55402

(d)US Bank
800 Nicolett Mall
Minneapolis, MN 55402

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Carroll Finance

(d)ARS Inc
POB 321472
Flowood, MS 39232-1472

(u)CARROLL EMC (CARROLLTON, GEORGIA)

(u) CARROLLTON GEORGIA WATER UTILITY

(u) COM-ED

(u) COMCAST CABLE INC

(u) CREDIT CENTRAL

(d) Carroll EMC
155 North Highway 113
Carrollton, GA 30117-7501

(d) Comcast
650 Centerton Road
Moorestown, NJ 08057-3985

(u) DISNEY MOVIE CLUB

(u) DRIVETIME CREDIT

(d) Drivetime
POB 29018
Phoenix, AZ 85038-9018

(d) Drivetime Credit
POB 53087
Phoenix, AZ 85072-3087

(u) FINGERHUT
INDIANA UNIVERSITY STUDENT LOAN ADMIN
WELLS FARGO BANK
US BANK

(u) FIRST PREMIER BANK CARD
TCFBANK

(u) FIRST PREMIER CREDIT CARD

(u) GARY INDIANA EMS SERVICES

(u) GARY INDIANA SANITATION DEPARTMENT

(d) Gary Indiana Sanitation Department
Attn: Ursula
839 Broadway
Gary, In 46402-2414

(d) Gary Indiana Services
200 East 5th Ave
Gary, IN 46402-1309

(u) HIGHLIGHTS MAGAZINE

(u) HOLYCROSS HOSPITAL

(d) Highlights Magazine
803 Church Street
Honesdale, PA 18431-1877

(d) HolyCross Hospital
2701 West 68th St
Chicago, IL 60629-1882

(u) I st FRANKLIN FINANCIAL

(u) ILLINOIS Tollway Authority

(u) INDIANA AMERICAN WATER

(u) INSTALOAN

(d) Illinois Tollway Authority
2700 Ogden Avenue
Downers Grove, IL 60515-1703

(d) Indiana American Water
555 East Countyline Road
Greenwood, IN 46143-1064

(u) LAKE STATION INDIANA MUNICIPAL COURT

(d) Lake County Indiana Superior Court
2293 Main Street
Crown Point, IN 46307-1854

(u) MARION COUNTY INDIANA

(d) Marion County Indiana
200 E Washington Street
Suite W122
Indianapolis, IN 46204-3335

(u) NIPSCO

(d) Online Collections
POB 1489
Winterville, NC 28590-1489

(u) PATRICIA A LLOYD, M.D.

(u) PEOPLES ENERGY

(u) PEOPLES GAS

(u) PROPERTY LIQUIDATORS/TIM LOVELESS

(d) Patricia A. Lloyd, M.D.
340 Blvd NE
Atlanta, GA 30312-1285

(d) Peoples Energy
Attn: Customer Service
200 E. Randolph
Chicago, IL 60601-6302

(u) REGIONS BANK

(u) RENT A CENTER

(d) Rent A Center
5501 Headquarters Drive
Plano, TX 75024-5845

(u) SPRINT

(u) SPRINT PCS

(u) STATE OF INDIANA DRIVER SERVICES

(u) STERLING FINANCE

(u) SUNSET FINANCE

(u) SUNTRUST BANK

(d) Sprint PCS
6480 Sprint Parkway
Overland Park, KS 66251-6106

(d) Sunset Finance
6678 Broad Street
Douglasville, GA 30134-1787

(d) Sunset Finance
726 Bankhead Highway
Carrollton, GA 30117-1918

(u) T Mobile

(u) TANNER HOSPITAL

(u) TCF NATIONAL BANK

(u)THE CITY OF GARY INDIANA

(u)THE CITY OF GARY INDIANA SANITATION DEPART

(u)THE CITY OF HOBART INDIANA

(d)THE CITY OF HOBART INDIANA
414 MAIN STREET
HOBART IN 46342-4444

(u)TMOBILE
NIPS CO

(d)Trust Recovery Services
541 Otis Bowen Drive
Munster, IN 46321-4158

(u)ULTRA FOODS (MERRILL VILLE)

(u)UNIVERSITY OF PHOENIX
WESTWOOD COLLEGE
SOUTHERN NEW HAMPSHIRE UNIVERSITY
PAYDAY LOAN STORE OF ILLINOIS
PAYDAY LOAN STORE OF INDIANA

(u)US BANK

(u)WEST GEORGIA AMBULANCE COMPANY
TANNER HOSPITAL OF CARROLLTON GEORGIA
EXPRESS REALTY OF VILLA RICA GEORGIA
INTERTECH PROBATION
CITY OF CARROLLTON, GEORGIA

(u)WESTERN SHAMROCK CORPORATION

(u)WILKES FINANCE CORPORATION

(d)Western Shamrock Corp
801 S ABE (2A)
San Angelo, TX 76903-6735

End of Label Matrix
Mailable recipients 130
Bypassed recipients 76
Total 206

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

**Traci Alexis Miller & Maurice
Western,**

Debtors.

Chapter 7

Bankruptcy No. 15-28416

Honorable Jacqueline P. Cox

**FIRST AND FINAL APPLICATION OF FACTORLAW FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

William J. Factor and The Law Office of William J. Factor, Ltd. (collectively, “**FactorLaw**”), special counsel for Karen R Goodman, not individually but as the chapter 7 trustee (the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of Traci Alexis Miller and Maurice Western (“**Traci**” and “**Maurice**” or, collectively, the “**Debtors**”), hereby submits its first and final application for compensation and reimbursement of expenses (the “**Application**”) pursuant to 11 U.S.C. §§ 330, 331 and 507(a)(1). FactorLaw seeks allowance of compensation in the amount of \$14,783.13 and reimbursement of expenses in the amount of \$98.44 incurred by FactorLaw during the period of October 14, 2015, through and including May 25, 2016 (the “**Application Period**”). In support of its Application, FactorLaw states as follows:

I. JURISDICTION

This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334, and Local Rule 40.3.1(a) of the United States District Court for the Northern District of Illinois. Venue of the above-captioned case (the “**Case**”) and of this motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. §§ 157(b)(1) and (b)(2)(A).

II. BACKGROUND

On August 19, 2015, the Debtors filed a petition for relief under chapter 7 of title 11, United States Code (11 U.S.C. § 101 *et seq.*, the “**Bankruptcy Code**”), thereby commencing this Case. The Trustee is the duly appointed and qualified trustee.

On January 5, 2016, this Court entered an order authorizing the Trustee to retain FactorLaw as her special counsel to represent her in a state court proceeding with regard to the proceeds of an annuity in which Traci claimed an interest (the “**Annuity Litigation**”). *See* Dkt. 37. The retention order provided that FactorLaw would be receive a contingency fee of 33.3% of the gross recovery in connection with the Annuity Litigation, as well as reimbursement of any out of pocket expenses.

As of result of FactorLaw’s efforts, the Trustee reached a settlement of the Annuity Litigation pursuant to which the Estate would receive \$44,393.79 (or 45% of the value of the annuity).¹ The settlement was approved by this Court on April 21, 2016. *See* Dkt. 57.

III. BASIS FOR THE REQUESTED RELIEF

A. FactorLaw’s fees under the contingency arrangement should be approved.

Under Section 330(a)(1)(A), the Court may award a professional person “reasonable compensation for actual, necessary services rendered[.]” 11 U.S.C. § 330(a)(1)(A). Section 330(a) further provides:

In determining the amount of reasonable compensation to be awarded, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—(A) the time spent on such services; (B) the rates charged for such services; (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under [the Bankruptcy Code]; (D) whether the services were

¹ For further details on the Annuity Litigation and the settlement see the motion to approve the settlement. Dkt. No. 55.

performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and (E) whether the compensation is reasonable, based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

Id. § 330(a)(3).

Section 327(a) provides that the trustee may, subject to court approval, employ attorneys that do not have any interest adverse to the Estate, and that are disinterested persons, as defined in 11 U.S.C. § 101(14). Next, Section 327(e) provides that a trustee may hire counsel for a specific purpose if it is in the best interest of the estate and the attorney does not have an interest adverse to the estate with respect to the matter for which employment is sought. Finally, Section 328 provides that a trustee “may employ or authorize the employment of a professional person ... on any reasonable terms and conditions of employment, including ... on a contingent fee basis.” 11 U.S.C. § 328(a).

The contingency fee of 33.3% of the gross recovery in the Annuity Litigation amounts to \$14,783.13. This fee is reasonable for the services provided by FactorLaw, the litigation risks assumed by FactorLaw, and results obtained by FactorLaw. FactorLaw was able to settle the Annuity Litigation, which had been dragging on for over ten years, for an amount that exceeds the total amount of claims filed against the Estate. Even after deducting FactorLaw’s contingency fee, the Estate will recover more than the total dollar value (\$20,441.26) of claims filed against the Estate.

FactorLaw believes the Estate would have incurred at least the amount of its contingency fee, and likely much more, had the Estate retained counsel on an hourly basis. FactorLaw professionals spent 70.9 hours representing the Trustee in connection with the Annuity Litigation and related matters. Dividing its contingency fee by the hours spent, FactorLaw’s hourly rate amounts to \$208.51 per hour, less than the lowest

hourly rate (\$250) charged by FactorLaw professionals that worked on this case.

FactorLaw further believes that Trustee would not have received as favorable settlement had she not been represented by contingency counsel, as the threat of continued aggressive litigation at substantial expense to the Trustee's opponent was a significant factor in the settlement of the Annuity Litigation.

Moreover, in addition to handling the Annuity Litigation, FactorLaw formulated and filed an objection to Traci's claim of exemption to the annuity. While objecting to Traci's exemption was not explicitly required by the terms of FactorLaw's engagement, if Traci was successful on her claim of exemption, the Estate would have no assets to distribute to creditors.

In conclusion, the work performed by FactorLaw professionals benefited the estate, and the contingency fee of \$14,783.13 is reasonable under the circumstances.

B. FactorLaw should be reimbursed out of pocket expenses.

FactorLaw also incurred \$49.22 in postage for serving the motion to approve settlement, and estimates that the cost of serving this Application will be the same amount, for a total of \$98.44 in expenses.

With respect to reimbursing expenses, the Court may award a professional person "reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1)(B). "An expense is necessary if it was incurred because it was required to accomplish the proper representation of the client." *In re Spanjer Bros., Inc.*, 191 B.R. at 749.

The postage expenses detailed above were the actual and necessary expenses incurred on behalf of the Estate, and such expenses were required to accomplish the proper representation of the Trustee and the Estate.

NOTICE

Pursuant to Bankruptcy Rule 2002, this Application is served on all creditors as scheduled by the Debtors, any parties requesting notice via CM/ECF, the U.S. Trustee, and the Debtors (who are pro se).

WHEREFORE, FactorLaw respectfully requests that this Court enter an Order:

- A. Allowing FactorLaw compensation for actual, necessary legal services in the amount of **\$14,783.13** and expenses in the amount of **\$98.44**;
- B. Authorizing the Trustee to pay FactorLaw compensation in the amount of **14,783.13** and expenses in the amount of **\$98.44**; and
- C. Granting such other relief as the Court deems just and equitable.

Dated: May 24, 2016

**THE LAW OFFICES OF
WILLIAM J. FACTOR, LTD.**

By: /s/ Z. James Liu
One of its Attorneys

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